

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Vikram Bhatia, D.D.S., et al., on behalf
of themselves and all others similarly
situated,

Plaintiffs,

v.

3M Company,

Defendant.

Case No. 0:16-cv-01304-DWF-DTS

**DECLARATION OF
DANIEL C. HEDLUND IN SUPPORT
OF PLAINTIFFS' MOTION FOR
FOURTH DISBURSEMENT OF
SETTLEMENT FUNDS TO
CLAIMANTS, PAYMENT OF FEES
AND EXPENSES FOR THE CLAIMS
ADMINISTRATOR, AND
PROPOSAL FOR DISTRIBUTION
OF REMAINING FUNDS**

I, Daniel C. Hedlund, hereby declare and state as follows:

1. I am a partner in the law firm of Gustafson Gluek PLLC ("Gustafson Gluek"), one of the Co-Lead Counsel firms appointed by the Court. I submit this declaration in support of Plaintiffs' Plaintiffs' Motion for Fourth Disbursement Of Settlement Funds To Claimants, Payment Of Fees And Expenses For The Claims Administrator, And Proposal For Distribution Of Remaining Funds.

2. I make this declaration based on personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

3. Pursuant to the Plan of Distribution ¶ 13 (Doc. No. 131-1), Class Counsel proposes these remaining \$9,155,805.22 funds be divided and distributed to all 462 claimants who submitted 33,303 Fixed-Amount Claims during one or both claim periods.

This equates to an additional \$274.92 per debond. Attached hereto this declaration as Exhibit Aa list of the recommended awards for the 462 claimants who submitted a total of 33,303 Fixed-Amount debonds.

I, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, and under the laws of the United States of America that the foregoing and the attached are true and correct to the best of my knowledge. Executed on this 2nd day of June 2022, in Minneapolis, Minnesota.

/s/ Daniel C. Hedlund
Daniel C. Hedlund